

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

RE:	)		
	)	CHAPTER:	7
Dainon Tarquinius Sidney	)	CASE NO.:	16-05506
SSN: XXX-XX-7845	)	JUDGE:	HARRISON
605 Lakemeade Pointe	)		
Old Hickory, TN 37138	)		
	)		
DEBTOR.	)		

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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: February 13, 2017.**

**IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: February 21, 2017 at 9:00 a.m. in Courtroom 3, Customs House, 701 Broadway, Nashville, TN 37203.**

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**NOTICE OF MOTION TO REOPEN CHAPTER 7 CASE FOR THE PURPOSE OF AMENDING STATEMENTS AND SCHEDULES AND FILING A MOTION TO VOID JUDICIAL LIEN OF THE BANK OF NASHVILLE**

Counsel for Debtor has asked the court for the following relief: to reopen the Chapter 7 Case for the purpose of amending schedules B and C of the original Chapter 7 petition and filing a motion to void judicial lien of the Bank of Nashville.

**YOUR RIGHTS MAY BE AFFECTED.** If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at: <https://ecf.tnmb.uscourts.gov>.

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1<sup>st</sup> Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by viewing the case on the court's website at <https://ecf.tnmb.uscourts.gov>.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

Date: January 23, 2017

Signature: /s/ Alex Koval  
Name: Alex Koval  
Address: 1222 16<sup>th</sup> Avenue South, Suite 12  
Nashville, TN 37212-2926

RE:

Dainon Tarquinius Sidney  
SSN: XXX-XX-7845  
605 Lakemeade Pointe  
Old Hickory, TN 37138

DEBTOR.

CHAPTER: 7  
CASE NO.: 16-05506  
JUDGE: HARRISON

**MOTION TO REOPEN CHAPTER 7 CASE FOR THE PURPOSE OF AMENDING STATEMENTS  
AND SCHEDULES AND FILING A MOTION TO VOID JUDICIAL LIEN OF THE BANK OF  
NASHVILLE**

COMES the Debtors, through counsel, Rothschild & Ausbrooks, PLLC, and pursuant to 11 U.S.C. §350(b) and Fed. R. Bankr. P. 5010 moves to reopen his Chapter 7 case for the purpose of amending Schedules B and C of the original petition and filing a motion to void judicial lien of the Bank of Nashville. In support of this Motion, the Debtor would state the following:

1. The Debtor's Chapter 7 case was filed on August 4, 2016, and a discharge was granted on November 8, 2016.
2. The Debtor listed The Bank of Nashville in the amount of \$88,445.00, as an unsecured creditor in his schedules. Debtor was unaware of a judgment lien recorded in Davidson County, Tennessee.
3. The Debtor is seeking to reopen his Chapter 7 case in order to amend his Scheduled B and C and proceed with a Motion to void the judicial lien of The Bank of Nashville.

WHEREFORE, PREMISES CONSIDERED, the Debtor moves to reopen his Chapter 7 case for the purpose of filing amended Scheduled B and C and a Motion to void the judicial lien of The Bank of Nashville.

Respectfully submitted,

*/s/ Alex Koval*

Alex Koval  
ROTHSCHILD & AUSBROOKS, PLLC  
Attorney for Debtor(s)  
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Nashville, TN 37212-2926  
(615) 242-3996 (telephone)  
(615) 242-2003 (facsimile)  
notice@rothschildbklaw.com

**CERTIFICATE OF SERVICE**

I certify that on this the 23rd day of January, 2017, I served a copy of the foregoing in the following manner:

***Email by Electronic Case Noticing to:***

Beth R. Derrick, Asst. U.S. Trustee  
Michael Gigandet, Chapter 7 Trustee

***By U.S. Postal Service, postage prepaid to:***

The Debtor at the above referenced address and:

The Bank of Nashville  
Attn: Officer  
401 Church Street  
Nashville, TN 37219

David M. Anthony  
Bone, McAllester, Norton, PLLC  
Counsel for The Bank of Nashville  
Nashville City Center  
511 Union Street, Suite  
Nashville, TN 37219

**/s/ Alex Koval**  
Alex Koval